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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 6, 1997

VIA HAND DELIVERY

Mr. William F. Caton

Secretary

Federal Communications Commission

1919 M Street, N.W., Room 222

Washington, D.C. 20554

Re: Application by BellSouth Corporation, BellSouth
Telecommunications, Inc., and BellSouth Long Distance,
Inc., for Provision of In-Region, InterLATA Services in
Louisiana

Dear Mr. Caton:

Accompanying this letter please find an original and sixteen copies of the Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, as well as electronic copies of the brief and supporting affidavits in both WordPerfect 5.1 and their original format (either Wordperfect or Word). Eleven of the paper copies are for the Office of the Secretary and five are for the Common Carrier Bureau. The applicants also are enclosing originals and three copies of confidential materials under seal, pursuant to 47 C.F.R. § 0.459. Interested parties should address inquiries regarding access to these confidential materials to Kevin J. Cameron, at the above-listed address and phone number.

Please date stamp the extra copy of this letter and return it to the individual delivering this package. Thank you for your assistance in this matter.

Sincerely,

Austin C. Schlick

Austin C. Schlick

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

NOV - 6 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Application by BellSouth Corporation,
BellSouth Telecommunications, Inc., and
BellSouth Long Distance, Inc., for
Provision of In-Region, InterLATA
Services in Louisiana

CC Docket No. 97-231

To: The Commission

**BRIEF IN SUPPORT OF APPLICATION BY BELL SOUTH FOR
PROVISION OF IN-REGION, INTERLATA SERVICES IN LOUISIANA**

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EXECUTIVE SUMMARY

This application should serve as further confirmation that BellSouth has worked earnestly and successfully to meet all prerequisites for in-region, interLATA relief under the Telecommunications Act of 1996 (the "Act" or "1996 Act"). BellSouth has opened the local exchange in Louisiana to competition by negotiating dozens of carrier-specific interconnection agreements and filing a Statement of Generally Available Terms and Conditions that has been approved by the State public service commission. The State commission conducted an extensive evidentiary proceeding, open to all, to investigate BellSouth's compliance with the requirements of section 271. After its investigation, the State commission found that BellSouth has met the Act's requirements and that BellSouth's provision of in-region, interLATA services would serve the public interest.

As in South Carolina, for which BellSouth has a pending application for long distance authority, long distance callers in Louisiana — and particularly average residential users — pay more than they should for interLATA service because BellSouth has been excluded from the market. Potential wireline carriers in Louisiana are holding back in offering facilities-based local service to residential customers even though they can obtain interconnection and unbundled network elements from BellSouth to ease their entry. These potential competitors are focusing instead on urban business markets, where they can earn higher profits by selectively "cherry picking" BellSouth's most profitable customers.

New competitors simply sense no urgency in entering the local market in Louisiana on a broad basis. As long as BellSouth cannot offer its ordinary local customers one-stop shopping, potential competitors face little risk from holding off as well. They can ignore residential callers

BellSouth, November 6, 1997, Louisiana

in favor of more lucrative business customers, or postpone entering the local telephone business altogether, knowing that BellSouth can neither gain an advantage by selling bundled services nor take a single penny from the incumbents' interLATA profits.

With this application, BellSouth seeks to bring greater local and long distance competition to all Louisianans. Notwithstanding the limited strategic entry by wireline local carriers, BellSouth is eligible to file under Track A, 47 U.S.C. § 271(c)(1)(A), because PCS providers unaffiliated with BellSouth have commenced service over their own networks in Louisiana. Under the plain language of the Act as well as this Commission's prior decisions, these PCS carriers are "competing providers of telephone exchange service . . . to residential and business subscribers." The legislative history of section 271 further makes clear that Track A is satisfied because these wireless carriers provide a facilities-based alternative to BellSouth for local calls.

BellSouth also has fully complied with the local competition provisions of the 1996 Act. The Louisiana Public Service Commission ("Louisiana PSC") conducted a nine-month review of BellSouth's compliance with section 271. It also established separate proceedings to ensure that BellSouth's resale discount and rates for interconnection and unbundled network elements are consistent with section 252 of the Communications Act. After thorough investigation into these three dockets, the Louisiana Commission: (1) concluded that BellSouth's Statement of Generally Available Terms and Conditions makes available to competitors each of the 14 items required under the competitive checklist and (2) set a resale discount and cost-based rates and approved their inclusion in the Statement. Existing wireline carriers, PCS providers, and any other parties

that seek to enter the local market in Louisiana have access to these terms under BellSouth's generic statement or their own, custom-tailored agreements.

In its review of BellSouth's eligibility for interLATA relief, the Louisiana PSC paid particular attention to competitors' access to BellSouth's operations support systems ("OSSs"). Parties such as AT&T, MCI, and the U.S. Department of Justice will claim in this proceeding that BellSouth cannot prove such access is available until competitors actually choose to avail themselves of it. Yet, after inspecting BellSouth's OSS interfaces and procedures and giving opponents an opportunity to prove alleged deficiencies in a live demonstration, the Louisiana PSC determined exactly the opposite: BellSouth's systems, the Louisiana PSC held, "do in fact work and operate to allow potential competitors full non-discriminatory access."ⁱ

The Louisiana PSC's findings establish BellSouth's satisfaction of all relevant requirements under sections 251 and 252 of the Communications Act and section 271's checklist. They rule out the possibility that the limited scope of local wireline competition in Louisiana is attributable to BellSouth rather than the business strategies of potential competitors.

In addition to meeting all requirements imposed by the State commission and the Act itself, BellSouth has abided by the general guidance given in this Commission's Michigan Orderⁱⁱ to the fullest extent possible while still preserving BellSouth's right to have a court decide

ⁱ Order U-22252-A, Consideration and Review of BellSouth Telecommunications, Inc.'s Preapplication Compliance with Section 271 of the Telecommunications Act of 1996, Dkt. U-22252, at 4-5, 15 (LPSC rel. Sept. 5, 1997) ("Compliance Order") (App. C Tab 136).

ⁱⁱ Memorandum Opinion and Order, Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as Amended, to Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137, FCC No. 97-298 (rel. Aug. 19, 1997) ("Michigan Order").

whether certain of these requirements would be consistent with the Act if applied to the facts in Louisiana. For example, this application includes extensive documentation requested by the Commission regarding performance data, pricing, and other matters, notwithstanding pending proceedings that bear on the legal relevance of such evidence.

The benefits of granting this application are crystal clear. BellSouth has, for example, committed to establish its basic interLATA rates at least 5 percent below those of AT&T immediately upon entering the market. This discount (and ensuing competitive marketing by all carriers) would guarantee residential callers in Louisiana, who are most in need of price relief, the opportunity to realize savings from a long distance carrier they know and can trust. By 2006, fuller competition as a result of in-region, interLATA relief will create more than 7,600 new jobs in Louisiana and increase the gross state product by more than \$900 million. Nationwide, residential customers would save \$7 billion per year. That means that these ordinary callers are losing well over \$100 million every week that the Commission delays section 271 relief — a price tag that should weigh heavily on this Commission.

BellSouth's entry into interLATA services will ignite competition in Louisiana's local markets as well. In particular, the major long distance carriers will no longer be able to pursue other opportunities with the assurance that BellSouth cannot sell packages of local and interLATA services consumers desire. After interLATA relief is granted, moreover, AT&T, MCI, and Sprint will be freed of all restrictions on their own bundled service packages, which will add an additional dimension to local competition.

BellSouth, November 6, 1997, Louisiana

The traditional justification for excluding Bell companies from interLATA services, and foregoing such benefits, is that they might dominate interexchange markets through cost misallocation or discrimination. Yet the 1996 Act, together with longstanding Commission regulations, state regulations, and market realities, renders such misconduct inconceivable. The local exchange in Louisiana is open to competitors. BellSouth will start with zero market share in a long distance business dominated by entrenched incumbents with vast resources and high sunk costs, factors that make successful predation unimaginable. Commission rules and procedures have successfully protected regulated ratepayers when incumbent local exchange carriers have entered other markets adjacent to the local exchange. As the Commission has confirmed, the 1996 Act gives it ample authority to deter anticompetitive behavior and to facilitate detection of potential violations of the Act.

There can be no basis for delaying level competition by BellSouth in Louisiana, except to hold back BellSouth until potential entrants such as AT&T and MCI, who have spent the last 21 months plotting regulatory strategies instead of pursuing market entry, are willing to compete. Any such effort to manage competition would flatly violate the 1996 Act and Congress's deregulatory policies. Just as important, a failure to free BellSouth to compete would — as this application demonstrates — gravely harm the Louisiana consumers whose interests should be paramount.

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APPENDIX A

TAB	DESCRIPTION	
	Affidavit	Subject
1	George F. Agerton	BST Section 272 Compliance
2	Guy L. Cochran	BST Section 272 Compliance
3	Richard J. Gilbert	Public Interest Test
4	John R. Gunter	Public Interest Test (Impossibility of Technical Discrimination)
5	Jerry A. Hausman	Public Interest Test*
6	David Hollett	Checklist Compliance (Billing Systems)
7	Victor E. Jarvis	BSLD Section 272 Compliance
8	David A. Kettler	Manufacturing Relief
9	W. Keith Milner	Checklist Compliance
10	D. John Roberts	Public Interest Test (No Risk of Predatory Pricing)*
11	Richard L. Schmalensee	Public Interest Test*
12	William N. Stacy	Checklist Compliance (Operations Support Systems)
13	William N. Stacy	Checklist Compliance (Performance Measures)
14	Alphonso J. Varner	Checklist Compliance and BST Section 272 Compliance
15	Glenn A. Woroch	Public Interest Test
16	Gary M. Wright	Local Competition

* Affidavits marked with an asterisk were originally filed with the Commission on September 30, 1997, as part of the Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in South Carolina, FCC Docket No. 97-208.

APPENDIX B

INTERCONNECTION AND RESALE AGREEMENTS		
TAB	APPROVAL	PARTY
1	10/08/96	American MetroComm Corporation Interconnection Agreement
2	10/08/96	Hart Communications Interconnection Agreement
3	10/08/96	Intermedia Communications, Inc. Interconnection Agreement and 06/20/97 Amendment
4	10/30/96	National Tel Interconnection Agreement and 06/20/97 Amendment
5	11/04/96	American Communications Services, Inc. (ACSI) Interconnection Agreement and 02/03/97 Amendment
6	02/03/97	Competitive Communications, Inc. Interconnection Agreement
7	02/03/97	TriComm, Inc. Interconnection Agreement
8	02/03/97	WinStar Wireless, Inc. Interconnection Agreement
9	02/04/97	Communication Brokerage Services, Inc. Resale Agreement
10	02/04/97	Tie Communications, Inc. Resale Agreement
11	03/12/97	Unidial Communications, Inc. Resale Agreement
12	03/14/97	US LEC of North Carolina L.L.C. Interconnection Agreement
13	04/08/97	American Communications Services, Inc. (ACSI) Resale Agreement
14	04/08/97	Interlink Telecommunications of Florida, Inc. Resale Agreement
15	04/08/97	U.S. Long Distance, Inc. Resale Agreement
16	04/21/97	Advanced Tel, Inc. Resale Agreement
17	06/19/97	BellSouth Cellular Corporation Interconnection Agreement and 10/05/97 Amendment
18	06/20/97	AT&T Wireless Services, Inc. Interconnection Agreement

INTERCONNECTION AND RESALE AGREEMENTS

TAB	APPROVAL	PARTY
19	06/20/97	Comm. Depot, Inc. Interconnection Agreement
20	06/20/97	DeltaCom, Inc. Interconnection Agreement and Amendments
21	06/20/97	FiberSouth, Inc. Interconnection Agreement and Amendment
22	06/20/97	GNet Telecom, Inc. Interconnection Agreement
23	06/20/97	ICG Telecom Group, Inc. Interconnection Agreement
24	06/20/97	KMC Telecom, Inc. Interconnection Agreement
25	06/20/97	LCI International Telecom Corporation Resale Agreement
26	06/20/97	LCI International Telecom Corporation Line Information Database (LIDB) Storage Agreement
27	06/20/97	Powertel, Inc. Interconnection Agreement
28	08/12/97	PrimeCo Personal Communications, L.P. Interconnection Agreement
29	08/12/97	SouthEast Telephone, Ltd. Interconnection Agreement
30	08/12/97	Sprint Spectrum, L.P. Interconnection Agreement
31	08/12/97	Telephone Company of Central Florida Resale Agreement
32	08/12/97	Teleport Communications Group Interconnection Agreement
33	08/20/97	ALEC, Inc. Interconnection Agreement
34	08/20/97	Communication Options Southern Region, Inc. d/b/a COI Resale Agreement
35	08/20/97	Inter-World Communications Resale Agreement
36	08/20/97	National Tel Resale Agreement
37	08/20/97	Preferred Payphones, Inc. Resale Agreement
38	08/20/97	RGW Communications, Inc. Resale Agreement
39	08/20/97	Sterling International Funding, Inc. d/b/a Reconex Resale Agreement
40	08/21/97	Cybernet Group Interconnection Agreement and Amendment and 10/26/97 Second Amendment

INTERCONNECTION AND RESALE AGREEMENTS

TAB	APPROVAL	PARTY
41	08/21/97	Interstate Telephone Group Interconnection Agreement and Amendment and 10/20/97 Second Amendment
42	09/01/97	Shell Offshore Services Company, Inc. Interconnection Agreement
43	09/23/97	Alliance Telecommunications, Inc. Resale Agreement
44	09/23/97	Annox, Inc. Renegotiated Resale Agreement
45	09/23/97	AXSYS, Inc. Renegotiated Interconnection Agreement
46	09/23/97	AXSYS, Inc. Renegotiated Resale Agreement
47	09/23/97	Don-Mar Telecommunications, Inc. Resale Agreement
48	09/23/97	NOW Communications, Inc. Renegotiated Resale Agreement
49	09/23/97	SouthEast Telephone, Ltd. Resale Agreement
50	09/23/97	Southern Phon-Reconnek, Inc. Renegotiated Resale Agreement
51	09/23/97	Supra Telecommunications, Inc. Resale Agreement
52	09/23/97	Tel-Link, L.L.C. d/b/a TEL-LINK, L.L.C. and Tel-Link of Florida, L.L.C. Renegotiated Resale Agreement
53	09/23/97	Wright Businesses, Inc. Renegotiated Resale Agreement
54	10/05/97	American MetroComm Corporation Renegotiated Resale Agreement
55	10/05/97	BTI Telecommunications, Inc. Resale Agreement
56	10/05/97	Data & Electronic Services, Inc. Resale Agreement
57	10/05/97	Diamond Telephone Resale Agreement
58	10/05/97	EZ Phone, Inc. Resale Agreement
59	10/05/97	JETCOM, Inc. Renegotiated Resale Agreement
60	10/05/97	TTE, Inc. Renegotiated Resale Agreement
61	10/05/97	Teleconex, Inc. Resale Agreement
62	10/05/97	Tele-Sys, Inc. Renegotiated Resale Agreement
63	10/20/97	Centennial Cellular Corp. Interconnection Agreement

INTERCONNECTION AND RESALE AGREEMENTS

TAB	APPROVAL	PARTY
64	10/20/97	Comm South Companies, Inc. Resale Agreement
65	10/26/97	Louisiana Unwired, Inc. Resale Agreement
66	10/26/97	MERETEL COMMUNICATIONS L.P. Interconnection Agreement
67	10/26/97	Netel, Inc. Resale Agreement
68	10/26/97	OmniCall, Inc. Resale Agreement
69	10/26/97	Preferred Carrier Services, Inc. Resale Agreement
70	11/05/97	ACCESS Integrated Networks, Inc. Resale Agreement
71	11/05/97	Davco, Inc. Resale Agreement
72	11/05/97	NEXTEL Communications, Inc. Interconnection Agreement
73	11/05/97	Robin Hood Telecommunications Resale Agreement
74	11/05/97	U.S. Dial Tone, Inc. Resale Agreement
75	11/05/97	US Telco, Inc. Resale Agreement
76	10/23/97	AT&T Telecommunications of the Southern Central States, Inc. (Arbitrated Interconnection Agreement & PSC Orders)

APPENDIX C-1

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
1	12/18/96	Transcript of Open Session
2	01/10/97	Official Bulletin No. 610
3	01/16/97	AT&T's Motion Requesting Leave to Intervene
4	01/17/97	LPSC Letter to Guerry Acknowledging Receipt of AT&T's January 16, 1997 Petition
5	01/22/97	Petition to Intervene of Sprint Communications Company L.P.
6	01/24/97	LPSC Letter to Atkinson Acknowledging Receipt of Sprint's January 22, 1997 Petition
7	01/31/97	MCI Telecommunications Corporation's Notice of Intervention
8	02/03/97	BellSouth Telecommunications, Inc. (BellSouth) Notice of Intervention and Request to be Placed on Service List
9	02/03/97	Louisiana Cable Telecommunications Association, Inc.'s Petition of Intervention, Request for Party of Record Status and Inclusion on Service List
10	02/04/97	LDDS WorldCom Notice of Intervention
11	02/04/97	Access Network Services, Inc.'s Motion to Intervene
12	02/05/97	LPSC Letter to Daly Acknowledging Receipt of LDDS WorldCom's February 4, 1997 Petition
13	02/05/97	LPSC Letter to Rieger Acknowledging Receipt of Louisiana Cable Telecommunications Association, Inc.'s February 3, 1997 Petition
14	02/05/97	LPSC Letter to Twomey Acknowledging BellSouth's January 31, 1997 Petition
15	02/05/97	LPSC Letter to King Acknowledging Receipt of MCI Telecommunications's January 31, 1997 Petition

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
16	02/07/97	LPSC Letter to Hubbard Acknowledging Receipt of Access Network Services, Inc.'s February 3, 1997 Petition
17	02/07/97	LPSC Staff Attorney Letter to Commissioners Regarding Proposed Procedural Schedule
18	02/19/97	Transcript of Open Session
19	02/24/97	BellSouth Notice of Intent to File Section 271 Application with the Federal Communications Commission
20	02/26/97	BellSouth Long Distance, Inc.'s Motion for Leave to File Petition of Intervention and Petition of Intervention
21	02/28/97	BellSouth's Request for Status Conference
22	03/03/97	Notice of Assignment and Scheduling of Status Conference
23	03/14/97	Direct Testimony of James G. Harralson, Michael Raimondi, Loren Scott, and William E. Taylor on Behalf of BellSouth Long Distance, Inc.
24	03/14/97	Direct Testimony of Robert C. Scheye and Alphonso J. Varner on Behalf of BellSouth
25	03/14/97	Report on March 13, 1997 Status Conference and Notice of Revised Procedural Schedule
26	03/17/97	Notice of Intervention and Motion to File Out-of-Time on Behalf of American Communication Services of Baton Rouge, Inc., American Communication Services of Louisiana, Inc. and American Communication Services of Shreveport, Inc.
27	03/17/97	LPSC Letter to Freysinger Acknowledging ACSI's Notice of Intervention and Motion to File Out-of-Time Intervention
28	03/20/97	Notice of Opportunity to Object to Late Intervention
29	03/24/97	AT&T's Notice of Deposition to All Counsel of Record
30	03/24/97	Notice of Deposition for D. Loren Scott
31	03/24/97	Revised Notice of Deposition for D. Loren Scott
32	03/27/97	Ruling on Motion for Late Intervention
33	04/01/97	AT&T's Motion to Amend Procedural Schedule
34	04/01/97	LPSC's First Set of Data Request to BellSouth

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
35	04/02/97	Order Amending Procedural Schedule
36	04/04/97	Amended Notice of Intent to File Section 271 Application with the Federal Communications Commission
37	04/07/97	Direct Testimony of Riley M. Murphy on Behalf of American Communication Services of Louisiana, Inc., American Communication Services of Shreveport, Inc., American Communication Services of Baton Rouge, Inc.
38	04/11/97	Direct Testimony of David E. Stahly and Melissa L. Closz on Behalf of Sprint Communications Company L.P.
39	04/14/97	Direct Testimony of Jay Bradbury, Preston Foster, Joe Gillan, and John Hamman on Behalf of AT&T Communications of the South Central States, Inc.
40	04/14/97	Direct Testimony of Don J. Wood and David L. Kaserman on Behalf of MCI Telecommunications Corporation and AT&T Communications of the South Central States, Inc.
41	04/17/97	BellSouth's Letter to All Parties Proposing Additional Hearing Dates
42	04/21/97	Notice of Time and Location for April 28, 1997 Status Conference
43	04/23/97	Sprint Letter to ALJ Requesting to Specially Set its Witnesses
44	04/23/97	BellSouth Long Distance, Inc.'s Response to LPSC's First Set of Data Request to BellSouth
45	04/23/97	BellSouth's Responses to LPSC's Data Request
46	04/24/97	Letter From D. Shapiro Requesting to be Placed on Service List
47	04/25/97	Notice of New Date and Time for Status Conference
48	04/29/97	Letter From W. Glenn Burns Informing LPSC of Substitute for Status Conference
49	04/30/97	MCI Telecommunications Corporation's Motion for Declaratory Order and Motion for Partial Summary Judgment
50	05/02/97	BellSouth's Rebuttal Testimony of Gloria L. Calhoun, Robert C. Scheye and Alfonso J. Varner

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
51	05/02/97	BellSouth Long Distance, Inc. Rebuttal Testimony of James G. Harralson and Dr. William E. Taylor
52	05/06/97	Ruling on MCI Telecommunications Corporation's Motion for Declaratory Order and Motion for Partial Summary Judgment
53	05/06/97	Report on May 5, 1997 Status Conference and Notice of Revised Hearing Dates
54	05/06/97	Ruling on Motion for Leave to Intervene of the Competitive Telecommunications Association
55	05/07/97	Motion for Leave to Intervene of the Competitive Telecommunications Association
56	05/07/97	Notice of Appearance of Counsel for WorldCom, Inc.
57	05/12/97	Notice of Opportunity for Objection to Motion for Leave to Intervene of the Competitive Telecommunications Association
58	05/14/97	Joint Witness List
59	05/14/97	BellSouth's Objection to Late Intervention
60	05/16/97	BellSouth Letter to ALJ Regarding Potential Move to Disqualify Counsel
61	05/16/97	Reply of CompTel to Ruling on Motion for Leave to Intervene
62	05/19/97	Statement of Generally Available Terms and Conditions for Interconnection, Unbundling and Resale Provided by BellSouth in the State of Louisiana
63	05/19/97	Hearing Transcript: Volume I
64	05/20/97	Hearing Transcript: Volume II
65	05/21/96	Hearing Transcript: Volume III
66	05/22/97	Notice of Commission Consideration of BellSouth's Statement of Generally Available Terms Within This Docket ALSO Notice of Deadlines Established for Intervention and Participation With Regard to Commission's Consideration of BellSouth's SGAT ALSO Notice of New Deadline for Filing Post-Hearing Briefs
67	05/22/97	Hearing Transcript: Volume IV
68	05/23/97	Hearing Transcript: Volume V

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
69	05/23/97	ACSI Letter to ALJ Regarding Witness Scheduling of Riley Murphy
70	05/27/97	Hearing Transcript: Volume VI
71	05/28/97	Hearing Transcript: Volume VII
72	05/29/97	Submission of MCI/Taylor Cross Exhibit 5
73	06/06/97	Motion to Intervene of Entergy Hyperion Telecommunications of Louisiana, L.L.C.
74	06/06/97	Intermedia Communications, Inc. Petition for Leave to Intervene
75	06/06/97	Notice of Intervention by Radiofone, Inc.
76	06/06/97	Notice of Intervention by WorldCom, Inc. Regarding BellSouth's SGAT
77	06/06/97	Comments of WorldCom, Inc. on BellSouth's Statement of Generally Available Terms
78	06/06/97	Petition for Leave to Intervene and Comments of the Telecommunications Resellers Association
79	06/09/97	Global Tel*Link, Inc.'s Notice of Intervention
80	06/09/97	Motion for Leave to File Petition of Intervention and Comments of Cox Fibernet Louisiana, Inc. Regarding BellSouth's Statement of Generally Available Terms and Conditions
81	06/10/97	Notice of Hearing
82	06/11/97	Motion of Radiofone, Inc. to Withdraw Request to Cross-Examine BellSouth's Witnesses
83	06/11/97	Intermedia Letter to ALJ Regarding Cross-Examination of BellSouth Witnesses, Testimony at June 13, 1997 Hearing, and Right to File Post-Hearing Brief
84	06/11/97	BellSouth Letter to ALJ Requesting the Cancellation of Hearings Scheduled for Cross-Examination of BellSouth Witnesses
85	06/11/97	Notice of Omission of One Intervenor in June 10, 1997 Notice and of Revised Request of Intervenor Intermedia Communications, Inc.

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
86	06/11/97	Notice of Cancellation of Hearing Previously Scheduled for June 12 and 13, 1997
[87]		Intentionally omitted.
88	06/11/97	Motion to File Out of Time Notice of Intervention on Behalf of Communications Workers of America
89	06/13/97	BellSouth's Objection to Late Intervention
90	06/16/97	Order Granting with Limitations Motion to File Out of Time Notice of Intervention on Behalf of Communications Workers of America
91	06/17/97	Brief of American Communication Services of Louisiana, Inc., American Communication Services of Baton Rouge, Inc. and American Communication Services of Shreveport, Inc.
92	06/17/97	Brief of Sprint Communications Company L.P.
93	06/18/97	Joint Post-Hearing Brief of Louisiana Cable Telecommunications Association and Cox Fibernet Louisiana, Inc.
94	06/18/97	Post-Hearing Memorandum of MCI Telecommunications Corporation
95	06/18/97	Post Hearing Brief of BellSouth Long Distance, Inc., on the Public Interest Issue
96	06/18/97	AT&T Communications of the South Central States, Inc.'s Post-Hearing Brief in Opposition to Approval of BellSouth's Statement of Generally Available Terms and Conditions, and In Opposition to BellSouth's Request for a Recommendation of Preapplication Compliance with §271 to Provide InterLATA Services Originating In-Region
97	06/18/97	BellSouth's Post Hearing Brief
98	06/18/97	LPSC Staff Post Hearing Brief
99	06/18/97	Post-Hearing Brief of WorldCom, Inc.

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
100	06/24/97	[Revised] AT&T Communications of the South Central States, Inc.'s Post-Hearing Brief in Opposition to Approval of BellSouth's Statement of Generally Available Terms and Conditions, and In Opposition to BellSouth's Request for a Recommendation of Preapplication Compliance with §271 to Provide InterLATA Services Originating In-Region
101	07/01/97	Supplemental Post-Hearing Memorandum of MCI Telecommunications Corporation
102	07/01/97	ACSI Supplement of its Post-Hearing Brief
103	07/01/97	AT&T Letter to ALJ Regarding BellSouth's SGAT
104	07/01/97	BellSouth Letter to ALJ Requesting Opportunity to File "Supplemental" Pleading in Response to AT&T and MCI's Late Filing of Post-Hearing Brief
105	07/02/97	Notice of Opportunity to File Supplemental Briefs Concerning June 26, 1997 Memorandum Opinion and Order of the Federal Communications Commission
106	07/03/97	Sprint Letter to ALJ Regarding Supplementing Briefs
107	07/03/97	Supplemental Comments of the Telecommunications Resellers Association
108	07/03/97	Intermedia Letter to ALJ Regarding BellSouth's SGAT
109	07/03/97	Supplemental Post-Hearing Memorandum of AT&T Communications of the South Central States, Inc.
110	07/07/97	Supplemental Brief of BellSouth
111	07/09/97	Recommendation of the ALJ
112	07/11/97	Request for Oral Argument on Behalf of BellSouth
113	07/15/97	ACSI Letter to Commissioners Regarding BellSouth Service
114	07/15/97	BellSouth Letter to Commissioners Regarding ACSI Letter
115	07/16/97	Transcript of Open Session
116	07/28/97	Transcript of Open Session
117	07/28/97	Order Rejecting ALJ Recommendation

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
118	08/04/97	MCI Telecommunications Corporation's Comments on Operational Support Systems
119	08/04/97	Cox Fibernet Louisiana, Inc.'s List of Potential Complications Regarding BellSouth's Operational Support Systems
120	08/04/97	Sprint's Response to Commission's Request for List of "Alleged Complications" with BellSouth's OSS
121	08/04/97	Comments of AT&T Communications of the South Central States Regarding BellSouth OSS
122	08/04/97	Comments of American Communications Services, Inc.
123	08/05/97	BellSouth Letter to ALJ Submitting South Carolina Public Service Commission Order Dated July 31, 1997
124	08/07/97	Notice of Technical Demonstration
125	08/07/97	Notice Listing Connections BellSouth Will Provide at Demonstration
126	08/08/97	AT&T Letter to ALJ Regarding BellSouth's SGAT in South Carolina
127	08/11/97	Response of BellSouth to August 4, 1997 Filings
128	08/11/97	Independent Payphone Service Providers Ad Hoc Committee Letter to LPSC Listing Facts for Commission to Consider
129	08/12/97	Supplemental and Amending Responses of BellSouth
130	08/12/97	MCI Letter to ALJ Regarding BellSouth's August 5, 1997 Letter
131	08/14/97	ALJ's Recommendation Regarding BellSouth's SGAT
132	08/15/97	Sprint's Comments on BellSouth's Operational Support Systems Demonstration
133	08/15/97	LPSC Staff 271 Recommendation
134	08/19/97	Cox Letter to LPSC Regarding BellSouth's Operational Support Systems
135	08/20/97	Transcript of Open Session
136	09/05/97	Order Approving the SGAT Subject to Modifications

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22252 Section 271 Proceeding	
137	09/09/97	Statement of Generally Available Terms and Conditions for Interconnection, Unbundling and Resale Provided by BellSouth
138	09/12/97	Sprint Letter to LPSC Regarding SGAT
139	09/15/97	BellSouth's Comments Pursuant to Order No. 22252-A
140	09/15/97	MCI Telecommunications Corporation's Comments Regarding BellSouth's Proposed Modified Statement of Generally Available Terms and Conditions
141	09/15/97	AT&T's Comments on the Eighth Circuit's Decision
142	09/16/97	BellSouth's Local Interconnection and Facility-Based Ordering Guide, Resale Ordering Guide, and Negotiations Handbook for Collocation

APPENDIX C-2

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22145 AT&T/BellSouth Arbitration	
143	09/20/96	AT&T's Petition for Arbitration Under the Telecommunications Act of 1996
144	09/27/96	Arbitrator's Notice of Telephone Status Conference
145	10/02/96	Sprint's Petition for Leave to Intervene and Inclusion on Service List
146	10/04/96	Motion of Sprint Communications Company L.P. for Consolidation
147	10/04/96	Official Bulletin No. 603
148	10/15/96	BellSouth Telecommunications, Inc.'s (BellSouth) Response to AT&T's Petition for Arbitration Under the Telecommunications Act of 1996
149	10/15/96	Exception of BellSouth Advertising & Publishing Corporation (BAPCO)
150	10/15/96	Objection of AT&T to Sprint's Motions for Intervention and for Consolidation
151	10/18/96	Notice of Order of the Eighth Circuit Court of Appeals' Order Granting Stay Pending Judicial Review and Request for Relief
152	10/24/96	AT&T's Motion to Reschedule Arbitration Trial and for Adoption of Revised Procedural Schedule
153	10/28/96	Ruling on AT&T's Motion to Reschedule Arbitration Panel Trial and for Adoption of Revised Procedural Schedule
154	10/28/96	Amended Hearing Notice
155	10/30/96	Ruling on Sprint's Motion to Consolidate
156	11/01/96	BellSouth BAPCO's Supplemental Memorandum in Support of Exception
157	11/12/96	AT&T Letter to LPSC Regarding the Appropriate Resale Discount

TAB	RECORD OF LOUISIANA PSC DOCKET NO. U-22145 AT&T/BellSouth Arbitration	
158	11/13/96	AT&T's Response to BAPCO's Exception
159	11/13/96	Transcript of Open Session
160	11/22/96	Direct Testimony of John Hamman, Wayne Ellison, Ronald Shurter, David Kaserman, William Carroll, Joseph Gillan, L.G. Sather, and Don Wood
161	11/22/96	Direct Testimony of Richard Emmerson, Gloria Calhoun, Robert Scheye, Alphonso Varner, and Keith Milner on Behalf of BellSouth
162	12/03/96	Order Granting Party Status to BellSouth Advertising & Publishing Corporation and Amending Procedural Schedule
163	12/06/96	Rebuttal Testimony of R. Shurter, D. Kaserman, W. Ellison, J. Gillan, J. Hannan, and W. Carroll on Behalf of AT&T Communications of the South Central States, Inc.
164	12/06/96	Rebuttal Testimony of Daonne Caldwell, Gloria Calhoun, Dr. Richard Emmerson, Keith Milner, and Alphonso J. Varner on Behalf of BellSouth
165	12/06/96	Pre-Filed Direct Testimony of Randall J. Cadenhead on Behalf of BellSouth Advertising & Publishing Corporation
166	12/06/96	Rebuttal Testimony of Robert C. Scheye
167	12/09/96	Letter Submitting to LPSC Affidavit of Richard Emmerson and RCS Exhibit 2 of Robert Scheye's Rebuttal Testimony
168	12/13/96	Pre-Hearing Brief of AT&T Communications of the South Central States
169	12/13/96	Pre-Hearing Brief of BellSouth
170	12/16/96	Hearing Transcript: Volume I
171	12/17/96	Hearing Transcript: Volume II
172	12/20/96	Post Hearing Memorandum of BellSouth Advertising & Publishing Corporation
173	12/23/96	AT&T Communications of the South Central States, Inc.'s Post-Hearing Brief
174	12/23/96	Post-Hearing Brief of BellSouth